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The Honorable Leonard P. Stark
September 11, 2020
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Morris James LLP

- Whether the Court should order Densify to produce documents, including electronically stored information (ESI), responsive to VMware's Requests for Production Nos. 3, 6, 12, 13, 17, 19, 25, 48, 53-57, 62, 68, 69, 71, 86, 90, 107, and 119 that are created or dated more than six years before VMware filed its counterclaims; and
- Whether the Court should order Densify to run additional search strings proposed by VMware to locate responsive ESI requested by VMware.
- VMware requests a teleconference at the Court's earliest convenience.

Densify's issues:

- Whether the Court should order VMware to supplement its responses to Densify's Interrogatories Nos. 1, 2, and 9 to identify the persons most knowledgeable about the requested subject matter;
- Whether the Court should order VMware to supplement its response to Densify's Interrogatory No. 9;
- Whether the Court should order VMware to search for and produce documents responsive to Densify's Request for Production No. 77;
- Whether the Court should order VMware to search for and produce documents responsive to Densify's Requests for Production Nos. 110-112;
- Whether the Court should order VMware to search for and produce documents responsive to Densify's Requests for Production Nos. 119-148.

Should Your Honor have any questions or concerns regarding the foregoing, counsel for both parties are available at the convenience of the Court.

Respectfully,

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (#3726)

cc: All counsel of record (via CM/ECF and electronic mail)